

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

**IN RE: CAST IRON SOIL PIPE AND
FITTINGS ANTITRUST LITIGATION**

No. 1:14-md-2508-HSM-CHS

**THIS DOCUMENT RELATES TO:
Direct Purchaser Class Action**

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF DISTRIBUTION**

Pursuant to Rule 23(e) and (g) of the Federal Rules of Civil Procedure, direct purchaser plaintiffs A&S Liquidating Inc., Hi Line Supply Co. Ltd., and Red River Supply, Inc. ("Direct Purchaser Plaintiffs"), on behalf of themselves and all others similarly situated, by and through the undersigned Settlement Class and Liaison Counsel, respectfully move this Court for an Order:

1. Finally approving the Settlement Agreement, and finding that its terms are sufficiently fair, reasonable and adequate; and
2. Approving the Plan of Distribution;

This motion is based on the accompanying Memorandum of Law in Support, the Declaration of Tina Chiango, and the Joint Declaration of Solomon B. Cera, Robert N. Kaplan and Kit A. Pierson in Support of Direct Purchaser Plaintiffs' (1) Motion for Final Approval of Settlement and Plan of Distribution and (2) Motion for an Award of Attorneys' Fees, for Reimbursement of Expenses, and Incentive Awards for the Named Plaintiffs submitted herewith.

WHEREFORE, Direct Purchaser Plaintiffs respectfully request that this Court grant this Motion for Final Approval of Class Action Settlement and Plan of Distribution.

Dated: April 21, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2017, I caused true and correct copies of the foregoing to be served electronically. Notice of this filing will be sent by operation of the Court's CM/ECF system to all parties shown on the electronic filing receipt.

/s/ Matthew P. McCahill
Matthew P. McCahill